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18 YVONNE NOSIK

19 UNITED STATES DISTRICT COURT
20 FOR THE DISTRICT OF NEVADA

21 YVONNE NOSIK

22 Plaintiff,

23 v.

24 ALL BRIGHT FAMILY DENTISTRY,
25 LLC dba ALL BRIGHT DENTAL, a
26 Nevada Limited Liability Company

27 Defendant.

Case No.: 2:18-cv-00972-RFB-VCF

**JOINT STIPULATION TO
REQUEST CONTINUANCE OF
DEADLINE TO SUBMIT JOINT
STATUS REPORT DUE TO
PLAINTIFF'S INTENDED
CHANGE OF COUNSEL AND
PROPOSED ORDER THEREON**

Action Filed: 5/27/2018

1 TO THE HONORABLE COURT:

2 Plaintiff Yvonne A. Nosik (“Plaintiff”) and Defendant All Bright Family
3 Dentistry, LLC d/b/a All Bright Dental (“Defendant”) (hereafter Plaintiff and
4 Defendant are jointly referred to as the “Parties”), hereby jointly stipulate to respectfully
5 request a brief continuance of the September 12, 2020 deadline to file a Joint Status
6 Report and Proposed Discovery and Scheduling Order. The Parties submit this request
7 because Plaintiff is currently in the process of engaging new counsel to represent her in
8 this case.

9 **STIPULATION**

10 1. WHEREAS, on August 12, 2020, the Court denied Plaintiff’s Motion to
11 Enforce Settlement and issued an order requiring the parties submit a Joint Status
12 Report and Discovery Plan/Scheduling Order by September 12, 2020.

13 2. WHEREAS, On September 8, 2020, Plaintiff’s counsel Michael Balaban
14 filed a Motion to Withdraw as Plaintiff’s Attorney in this case. As of the time of
15 filing this Joint Stipulation and Request, the Court has not ruled on Mr. Balaban’s
16 Motion.

17 3. WHEREAS, On September 11, 2020, Michelle Nisce of Prime Law
18 Group notified Defendant’s counsel that Plaintiff intended to engage her to represent
19 Plaintiff in this case. Ms. Nisce and Mr. Balaban informed Defendant’s counsel that
20 they intend to file a Stipulation to Substitute Ms. Nisce in as Plaintiff’s counsel in this
21 case. As of the time of filing this Joint Stipulation and Request, Plaintiff has not yet
22 filed the Stipulation to Substitute counsel.

23 4. WHEREAS, Plaintiff’s intended new counsel Ms. Nisce indicated that
24 she requires additional time to become Plaintiff’s counsel of record and get up to
25 speed on the case before she can engage in meaningful discussions about a proposed
26 Discovery and Scheduling Order.

1 5. WHEREAS, Plaintiff's soon to depart counsel, Mr. Balaban, is unable to
2 commit to deadlines in a Discovery and Scheduling Order given that he will not be
3 involved in this case after Ms. Nisce steps in.

4 6. THUS, for the reasons listed above, the Parties jointly respectfully
5 request the Court continue the September 12, 2020 deadline to file a Joint Status
6 Report and Proposed Discovery and Scheduling Order to September 25, 2020.

7 ■
8 LAW OFFICES OF
9 MICHAEL P. BALABAN

KAEDIAN LLP

10 /s/ Michael P. Balaban
11 Michael P. Balaban, Esq.
12 10726 Del Rudini St.
13 Las Vegas, NV 89141
14 Attorney for Plaintiff,
Yvonne Nosik
Dated: September 12, 2020

/s/ Nannina L. Angioni
Nannina L. Angioni, Esq.
3690 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
Attorney for Defendant,
All Bright Family Dentistry
Dated: September 12, 2020

15
16 **ORDER**

17 GOOD CAUSE HAVING BEEN SHOWN, the Court continues the September
18 12, 2020 deadline to file a Joint Status Report and Proposed Discovery and
19 Scheduling Order to September 25, 2020.

20 **IT IS SO ORDERED.**

21
22
23 Dated: 9-21-2020

24 
25 The Honorable Cam Ferenbach
26 United States Magistrate Judge
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